

ESTTA Tracking number: **ESTTA37462**

Filing date: **07/01/2005**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

<b>Proceeding</b>	91161734
<b>Party</b>	Plaintiff SWATCH S.A. ,
<b>Correspondence Address</b>	JESS M. COLLEN COLLEN IP THE HOLYOKE-MANATTAN Bldg, 80 S Highland Ave Ossining, NY 10562
<b>Submission</b>	Stipulated/Consent Motion to Extend
<b>Filer's Name</b>	Jeffrey A. Lindenbaum
<b>Filer's e-mail</b>	jlindenbaum@collenip.com, jcollen@collenip.com, lleitner@collenip.com
<b>Signature</b>	/Jeffrey A. Lindenbaum/
<b>Date</b>	07/01/2005
<b>Attachments</b>	90625.mot ext 7-1-05_20050701115255.pdf ( 3 pages )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Swatch S.A.	)	
	)	
	)	
	)	
Opposer,	)	
	)	
vs.	)	Opposition No. 91,161,734
	)	Mark: COOMI
	)	
Bhasin Enterprise	)	
	)	
	)	
Applicant.	)	
	)	
	)	

**MOTION ON CONSENT TO EXTEND DISCOVERY AND RESET SUBSEQUENT PERIODS FOR SIXTY (60) DAYS**

The Opposer respectfully requests that the discovery period be extended by sixty (60) days up to and including **September 5, 2005** and that all subsequent periods be reset accordingly. Opposer is waiting for Applicant to provide available dates for the noticed deposition for Applicant's Rule 30(b)(6) corporate representative.

Charles Kennedy, Esq., counsel for Applicant, consented to this request via telephone on July 1, 2005.

The trial calendar is thus as follows:

THE PERIOD FOR DISCOVERY TO CLOSE:      September 5, 2005

Testimony period for party in  
position of plaintiff to close  
(opening thirty days prior thereto):      December 2, 2005

Testimony period for party in  
position of defendant to close  
(opening thirty days prior thereto):      January 30, 2005

Rebuttal testimony period to close  
(opening fifteen days prior thereto):

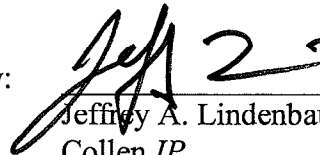
March 15, 2005

Briefs on final hearing shall become due as provided in Trademark Rule 2.128.

It is respectfully moved that the periods be reset as indicated above with the concurrence of the Trademark Trial and Appeal Board. This request is filed in triplicate.

Respectfully submitted  
for Opposer,

By:



Jeffrey A. Lindenbaum  
Collen *IP*

Telephone No. 914-941-5668

DATED: July 1, 2005

**COLLEN *IP***  
**INTELLECTUAL PROPERTY LAW**  
**THE HOLYOKE-MANHATTAN BUILDING**  
**80 SOUTH HIGHLAND AVENUE**  
**TOWN OF OSSINING**  
**WESTCHESTER COUNTY, NEW YORK 10562**

SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 03-2465.

COLLEN *IP*

BY: \_\_\_\_\_




DATE: July 1, 2005

CERTIFICATE OF SERVICE

I, Jeffrey A. Lindenbaum, hereby certify that this Motion On Consent To Extend the Close of Discovery And Reset Subsequent Periods has been served upon the following attorney, by First Class Mail, Postage Prepaid, this 1<sup>st</sup> day of July, 2005:

Charles P. Kennedy  
Lerner, David, Littenberg, Krumholz & Mentlik, LLP  
600 South Avenue West  
Westfield, NJ 07090  
*Attorney for Applicant*



A handwritten signature in black ink, appearing to read "JA 21", is written over a horizontal line.